

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

In re:

The Financial Oversight and Management Board for
Puerto Rico,

As Representative of

The Commonwealth of Puerto Rico, et al.

Debtors

PROMESA
Title III

No. 17 BK 3283-LTS

(Jointly Administered)

**REQUEST OF EXTENSION OF TIME TO REPLY TO THE FOUR
HUNDRED EIGHTY – FIRST OMNIBUS OBJECTION (SUBSTANTIVE)
OF THE COMMONWEALTH OF PUERTO RICO AND IT’S EMPLOYEE’S
RETIREMENT SYSTEM TO CLAIMS THE DEBTORS ALLEGE ARE NOT LIABLE
(Related to Docket Entry No. 21427)**

COMES NOW, Claimants Aníbal Arroyo Bolerin, Rosa Idalia Orengo Rohena, Ada Norely López Santiago, Arinda Colón Colón, represented by the undersigned counsel hereby state and request as follows:

1. The United States District Court for the District of Puerto Rico has subject matter jurisdiction to consider this matter and the relief requested herein pursuant to PROMESA section 306(a)¹.
2. Venue is proper in this district pursuant to PROMESA section 307(a)².
3. On July 1st, 2022, the debtors filed its *Four Hundred Eighty-First Omnibus Objection (Substantive) of the Commonwealth of Puerto Rico and the Employees Retirement System of the Government of the Commonwealth of Puerto Rico to Claims for Which the Debtors Are Not Liable* under docket entry no. 21427.

¹ 48 USC §2166

² 48 USC §2167

4. The Claimants request an extension of time of fourteen (14) days to respond to the objection filed under docket entry no. 21427 and/or otherwise plead³.

5. This request is made by the Claimants to allow them to comply with item number 2(a) of the *Third Amended Standing Order* dated March 3, 2021.⁴

WHEREFORE, the undersigned attorney requests from this Honorable Court to take notice of the preceding facts and grant the extension of time of thirty (30) days to reply to the debtors four hundred eighty-first omnibus objection filed under docket entry no. 21427.

RESPECTFULLY SUBMITTED.

In Caguas, Puerto Rico, this 29th day of July 2022.

CERTIFICATE OF SERVICE: I CERTIFY that on this same date the foregoing document has been electronically filed WITH THE Clerk of the Court using the CM/ECF system which sends notification of such filing to all system's participants, including the U.S. Trustee's Office. I further certify that this notice has been served through electronic mailing address to the attorneys for the Financial Oversight and Management Board for Puerto Rico as representative for the Commonwealth and ERS: Herman D Bauer, Esq. herman@oneillborges.com and Martin J Beinenstock mbienenstock@proskauer.com and to the attorneys for the damages claim in the Puerto Rico Court of Appeals Ivan Aponte González, Esq. ia@gaqlaw.com and Pedro Santana González, santanaglaw@gmail.com.

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³ The contract to retain legal services of our law offices was signed on July 26th, 2022

⁴ This item essentially requires from counsel *to consult to the greatest extent feasible with all other affected parties in an effort to obtain their consent to the request*. The undersigned will furnish a letter to the counsel of record of the Oversight Board and of the Puerto Rico Public Broadcasting Corporation (PRPBC) outlining our position on the matters related to the objection to claims at docket number 21427 and to offer simple and quick solutions which would avoid further attention from this Honorable Court.